

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON )  
TALCUM POWDER PRODUCTS )  
MARKETING, SALES PRACTICES AND )  
PRODUCTS LIABILITY LITIGATION )

MDL No. 2738 (MAS) (RLS)

*This Document Relates To All Cases* )

**[PROPOSED] ORDER GRANTING DEFENDANTS' MOTION  
OBJECTING TO SPECIAL MASTER'S OPINION RELATED TO  
PLAINTIFFS' RENEWED MOTION FOR LEAVE TO FILE SECOND  
AMENDED MASTER LONG FORM COMPLAINT**

**THIS MATTER** having been opened to the Court by Defendants Johnson & Johnson and LLT Management LLC, f/k/a LTL Management LLC, (“Defendants”) for entry of an Order (1) vacating the Special Master’s January 10, 2024 Opinion and Special Master Order No. 17 (Deciding Plaintiffs’ Motion to Amend) (Dkt. No. 28902), and (2) denying the Plaintiffs’ Renewed Motion for Leave to File a Second Amended Master Long Form Complaint (Dkt. No. 26636), and the Court having considered the submissions of the parties, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2024,

**ORDERED** as follows:

1. Special Master's January 10, 2024 Opinion and Special Master Order No. 17 (Deciding Plaintiffs' Motion to Amend) (Dkt. No. 28902) is hereby **VACATED**.

2. Plaintiffs' Renewed Motion for Leave to File a Second Amended Master Long Form Complaint (Dkt. No. 26636) is hereby **DENIED**.

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Hon.